

## REMARKS

### Introduction:

Claims 1 through 12, and 22 through 29 were pending in the patent application when an Office Action mailed July 11, 2003 rejected Claims 1-4 and 6-9, objected to Claims 5 and 10-12 as being dependent upon a rejected base claim, and allowed claims 22-29. The Examiner is thanked for indication of allowable subject matter. The Office Action also requested informal corrections to the Specification, and objected to the Drawings as not showing every feature of the invention recited in the Claims.

By way of this Amendment, and without introducing new matter, the Applicants have amended the Figures, Specification, and the Claims. Applicants respectfully request entry of the amendment, reconsideration, and allowance of all claims pending in this patent application.

### Objection to the Specification:

On page 4 line 10, 'motor 10' was replaced with -- motor 60 --. On page 4, line 23, 'air turbine air compressors' was replaced with -- air compressors -- .

The Specification was also amended to include descriptions of the FIGURES 2, 3A, 3B, and 4, which show the features recited in Original Claims 3, 4, 5, 6, and 22-29. Because the original claims form part of the specification, no new matter has been added. Applicants respectfully request entry of this amendment to the Specification.

### In the Drawings:

New FIGURES 2, 3A, 3B and 4, are added and show the features that are recited in Original Claims 3, 4, 5, 6 and 22 through 29. Because Original Claims 3, 4, 5, 6, and 22-29 form part of the specification, no new matter has been added. Applicants respectfully request entry of new FIGURES 2, 3A, 3B and 4.

Rejection of Claims 3, 7, 8, 9 and 27 under 35 U.S.C. § 112:

The Office Action rejected Claims 3, 7, 8, 9, and 27 for failing to particularly point out and distinctly claim subject matter. Claim 3 has been cancelled.

Claim 7 recites that the first subsystem is a hydraulic pump. Claim 8 recites that the second subsystem is an air compressor. Claim 9 recites that the air compressor of Claim 8 is an air cycle machine. Claim 27 similarly recites that the air compressor of Claim 22 is an air cycle machine. Applicants respectfully submit that recitations of a hydraulic pump, an air compressor, and an air cycle machine are recitations of structure and not merely intended uses of the system. A hydraulic pump drives a hydraulic system, an air compressor drives an air system, and an air cycle machine cools air in a cooling system.

Applicants respectfully request reconsideration and allowance of Claims 7, 8, 9 and 27.

Rejection of Claims 1, 3, 7, 8 and 9 under 35 U.S.C. § 102(b):

The Office Action rejected Claims 1, 3, 7, 8, and 9 as being anticipated by Curtis (FIG 6), Batten et al., or Green. Claims 1 and 3 have been cancelled. The limitations of Claim 1 have been copied into Claims 7, 8, and 9. Applicants respectfully traverse the rejections of Claims 7, 8, and 9.

Curtis (FIG 6) discloses a reversible electric motor driving two fuel pumps. Batten et al. disclose a reversible hydraulic motor driving two fuel pumps. Green discloses a reversible electric motor driving a fan and a vacuum pump.

None of the cited references teach or suggest all of the limitations recited in Claims 7, 8, or 9. None of the cited references teach or suggest a hydraulic pump as recited in Claim 7, as amended. Additionally, none of the cited references teach or suggest an air compressor as recited in Claim 8, as amended. Finally, none of the cited references teach or suggest an air cycle machine as recited in Claim 9, as amended. Applicants therefore request entry of the

Amendment and reconsideration and allowance of Claims 7, 8, and 9, as amended. Because none of the cited references teach or suggest all of the limitations of any of Claims 7, 8, or 9, as amended, Applicants respectfully submit that Claims 7, 8, and 9 are not anticipated by Curtis, Batten et al., or Green.

Rejection of Claims 2, 4, and 6 under 35 U.S.C. § 103(a):

The Office Action rejected Claim 2 as being unpatentable over Curtis or Green in view of Cunkelman et al., and rejected Claims 4 and 6 as unpatentable over Curtis or Green in view of Mino, et al.

Regarding Claim 2, the Office Action stated that it would have been obvious to substitute a dual-speed reversible electric motor for the motor of each of Curtis or Green. Regarding Claims 4 and 6, the Office Action stated that it would have been obvious to provide the motor driven pump of either of Curtis or Green with gearing between the overrunning clutches and the output shafts. Applicants respectfully traverse these statements of obviousness.

Curtis and Green have been discussed above. Neither Curtis nor Green teach or suggest a dual speed reversible motor as recited in Claim 2, as amended. Cunkelman et al. does not overcome this deficiency of both Curtis and Green.

Applicants respectfully submit that a *prima facie* case of obviousness has not been established because the combinations of cited references do not teach or suggest the claimed invention. Neither Curtis nor Green in view of Cunkelman et al. teach or suggest a reversible and dual speed motor as recited in Claim 2, as amended.

As a result, a *prima facie* case of obviousness has not been established, and Claim 2, as amended, is patentable over the combinations of cited references. Applicants respectfully request entry of the Amendment, and reconsideration and allowance of Claim 2.

Claims 4 and 6 are amended to depend from Claim 2, as amended. Regarding Claims 4 and 6, Applicants also submit that a *prima facie* case of obviousness has not been established.

Curtis and Green have been discussed above with reference to Claim 2, as amended. Neither Curtis nor Green teach or suggest a reversible dual speed motor as recited in Claim 2, as amended. Mino et al. does not overcome this deficiency of both Curtis and Green. Mino et al. teaches a reversible motor and gearing. Mino et al. does not teach a reversible dual speed motor. Therefore, the combinations of Curtis or Green in view of Mino et al. do not teach or suggest a reversible dual speed motor as recited in Claim 2, as amended.

As a result, a *prima facie* case of obviousness has not been established, and Claim 2, as amended, is patentable over the combinations of cited references.

By virtue of their dependency from Claim 2 and for other reasons, Claims 4 and 6 are also allowable over the combinations of cited references. Applicants therefore request entry of the Amendment and reconsideration and allowance of Claims 4 and 6, as amended.

Allowable Subject Matter:

Claims 22 through 29 are allowed. The Examiner is thanked for indication of allowable subject matter.

Claim 5 was objected to as being dependent on a rejected base claim, but would be allowable if re-written in independent form including the limitations of Claims 1 and 4. The limitations of Claim 1, Claim 4, and Claim 5 have been written into new independent Claim 35. Claim 5 has been cancelled. Applicants request entry of the amendment, and consideration and allowance of new Claim 35.

Claim 10 was objected to as being dependent on a rejected base claim, but would be allowable if re-written in independent form including the limitations of Claim 1. The limitations of Claim 1 have been written into Claim 10. Claims 11 and 12 are dependant upon Claim 10, as amended. By virtue of their dependency from allowable Claim 10 and for other reasons, Claims 11 and 12 are allowable.

Applicants therefore request entry of the Amendment, reconsideration and allowance of Claims 10, 11, and 12, as amended.

Conclusion:

Applicants respectfully submit that all claims remaining in this patent application are in condition for allowance. Objections to the specification and the drawings have been overcome without introducing new matter. All of the claims are patentable over the cited references.

Applicants respectfully request entry of the amendment, and reconsideration and allowance of all claims remaining in this patent application.

If the Examiner has questions, the Examiner is invited to contact the Applicants attorney listed below.

Respectfully submitted,

BLACK LOWE & GRAHAM<sup>PLLC</sup>



Mark S. Beaufait

Registration No. 48,529

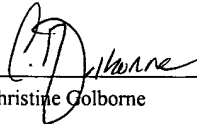
Direct Dial: 360.464.1380

**MAIL CERTIFICATE**

I hereby certify that this communication is being deposited with the United States Postal Service via First Class Mail under 37 C.F.R. § 1.08 on the date indicated below addressed to: MAIL STOP FEE AMENDMENTS, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450..

11/12/2003

Date of Deposit



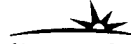
Christine Golborne

**25315**  
CUSTOMER NUMBER

- 15 -

BOEI-1-1018ROA2

BLACK LOWE & GRAHAM<sup>PLLC</sup>



701 Fifth Avenue, Suite 4800  
Seattle, Washington 98104  
206.381.3300 • F: 206.381.3301